

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY'S HOUSE
RECORDINGS INC., CE OPCO, LLC d/b/a
COMBS GLOBAL f/k/a COMBS
ENTERPRISES, LLC, BAD BOY
ENTERTAINMENT HOLDINGS, INC., BAD
BOY PRODUCTIONS HOLDINGS, INC., BAD
BOY BOOKS HOLDINGS, INC., BAD BOY
RECORDS LLC, BAD BOY ENTERTAINMENT
LLC, BAD BOY PRODUCTIONS LLC,
ORGANIZATIONAL DOES 1-10, INDIVIDUAL
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN
CARTER'S OPENING BRIEF IN SUPPORT OF HIS MOTION
TO DISMISS PURSUANT TO FED. R. CIV. P. 12(B)(6)**

I, Alex Spiro, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of a list of New York City Automated Register System (ACRIS) search results for deed and other conveyance documents listing Sean Combs as a party, as well as a true and correct copy of a photograph showing the entrance of the property located at 813 Park Avenue, New York, NY 10021.

3. Attached hereto as **Exhibit 2** is a true and correct copy of a deed record from Suffolk County generated through a Lexis Nexis search for real property records listing Sean

Combs as a party as well as a true and correct copy of a photograph showing the entrance of the property located at 40 Hedges Banks Drive, East Hampton, New York 11937.

4. Attached hereto as **Exhibit 3** is a true and correct copy of a of a deed record from Bergen County, New Jersey generated through a Lexis Nexis search for real property records listing Sean Combs as a party as well as a true and correct copy of a photograph showing the entrance of the property located at 27 Burning Hollow Road, Saddle River, NJ 07458.

5. Attached hereto as **Exhibit 4** is a true and correct copy of a deed record from Bergen County, New Jersey generated through a Lexis Nexis search for real property records listing Sean Combs as a party as well as a true and correct copy of a photograph showing the entrance of the property located at 207 Anderson Ave., Alpine, NJ 07620.

6. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:00 pm – 12:00 AM from Radio City Music Hall to 40 Hedges Bank Drive, East Hampton, NY 11937.

7. Attached hereto as **Exhibit 6** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:00 pm – 12:00 AM from Radio City Music Hall to the West Side Highway, and from the West Side Highway to the neighborhoods of Highbridge, Morris Heights, and Mt. Eden in Bronx County, New York.

8. Attached hereto as **Exhibit 7** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:00 pm – 12:00 AM from Radio City Music Hall to Franklin Delano Roosevelt Drive, and from

the Franklin Delano Roosevelt Drive to the neighborhoods of Mott Haven and the South Bronx, Bronx County, New York.

9. Attached hereto as **Exhibit 8** is a true and correct copy of screenshots from Google Maps showing aerial views of the neighborhoods of Highbridge, Morris County, Mt. Eden, Mott Haven, and the South Bronx, Bronx County, New York.

10. Attached hereto as **Exhibit 9** is a true and correct copy of a screenshot from Google Maps of Gracie Mansion (E 88th St &, East End Ave, New York, NY 10028) and a report from New York City's "Zola" Zoning & Land Use Map for Gracie Mansion, E 88th St &, East End Ave, New York, NY 10028.

11. Attached hereto as **Exhibit 10** is a true and correct copy of a screenshot from Google Maps of 200 E 83rd Street, New York, NY 10028 and a report from New York City's "Zola" Zoning & Land Use Map for 200 E 83rd Street, New York, NY 10028.

12. Attached hereto as **Exhibit 11** is a true and correct copy of a screenshot from Google Maps of 15 Central Park West, New York, NY 10023 and a report from New York City's "Zola" Zoning & Land Use Map for 15 Central Park West, New York, NY 10023.

13. Attached hereto as **Exhibit 12** is a true and correct copy of a screenshot from Google Maps of 390 West End Avenue, New York, NY 10024 and a report from New York City's "Zola" Zoning & Land Use Map for 390 West End Avenue, New York, NY 10024.

14. Attached hereto as **Exhibit 13** is a true and correct copy of a screenshot from Google Maps of 225 West 86th Street, New York, NY 10024 and a report from New York City's "Zola" Zoning & Land Use Map for 225 West 86th Street, New York, NY 10024.

15. Attached hereto as **Exhibit 14** is a true and correct copy of a screenshot from Google Maps of 60 E 88th Street, New York, NY 10128 and a report from New York City’s “Zola” Zoning & Land Use Map for 60 E 88th Street, New York, NY 10128.

16. Attached hereto as **Exhibit 15** is a true and correct copy of a screenshot from Google Maps of 435 E 52nd Street, New York, NY 10022 and a report from New York City’s “Zola” Zoning & Land Use Map for 435 E 52nd Street, New York, NY 10022.

17. Attached hereto as **Exhibit 16** is a true and correct copy of a screenshot from Google Maps of 1185 Park Avenue, New York, NY 10128 and a report from New York City’s “Zola” Zoning & Land Use Map for 1185 Park Avenue, New York, NY 10128.

18. Attached hereto as **Exhibit 17** is a true and correct copy of a screenshot from Google Maps of 455 Central Park West, New York, NY 10025 and a report from New York City’s “Zola” Zoning & Land Use Map for 455 Central Park West, New York, NY 10025.

19. Attached hereto as **Exhibit 18** is a true and correct copy of a screenshot from Google Maps of 860 United Nations Plaza, New York, NY 10017 and a report from New York City’s “Zola” Zoning & Land Use Map for 860 United Nations Plaza, New York, NY 10017.

20. Attached hereto as **Exhibit 19** is a true and correct copy of a screenshot from Google Maps of 1925 Adam Clayton Powell Jr. Blvd., New York, NY 10026 and a report from New York City’s “Zola” Zoning & Land Use Map for 1925 Adam Clayton Powell Jr. Blvd., New York, NY 10026.

21. Attached hereto as **Exhibit 20** is a true and correct copy of a screenshot from Google Maps of 1 W 72nd Street, New York, NY 10023 and a report from New York City’s “Zola” Zoning & Land Use Map for 1 W 72nd Street, New York, NY 10023.

22. Attached hereto as **Exhibit 21** is a true and correct copy of The Council Report of the Humans Services Division, Committee on General Welfare Jointly with the Committee on Women's Issues, dated November 30, 2000 concerning the Victims of Gender-Motivated Violence Protection Act (the "GMVPA").

23. Attached hereto as **Exhibit 22** is a true and correct copy of a Transcript of the Minutes of the New York City Council, dated December 5, 2000 concerning the GMVPA.

24. Attached hereto as **Exhibit 23** is a true and correct copy of a Committee Report of the Human Services Division, New York City Council, dated December 8, 2021 concerning the GMVPA.

25. Attached hereto as **Exhibit 24** is a true and correct copy of a Transcript of the Minutes of the New York City Council, dated November 30, 2000 concerning the GMVPA.

I declare under the penalty of perjury that the foregoing statements are true and correct.
Executed in New York, New York on the 4th day of February 2025.

/s/ Alex Spiro
Alex Spiro